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UNITED STATES OF AMERICA

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

JUN 02 2005

at 12 o'clock and 55 min.
WALTER A. Y. H. CHINN/CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. 04-00134 SOM
)	
Plaintiff,)	SUPERSEDING INDICTMENT
)	[21 U.S.C. § 846 and
vs.)	18 U.S.C. § 2]
)	
MICHAEL ALLEN BUSH, (02),)	
LANI ANN BREWER, (03),)	
)	
Defendants.)	

SUPERSEDING INDICTMENT

COUNT 1

The Grand Jury charges that:

From on or about November 1, 2003 in the District of Hawaii, defendants MICHAEL ALLEN BUSH and LANI ANN BREWER did conspire together with each other and with other persons known

and unknown to the Grand Jury, to knowingly and intentionally distribute and possess with intent to distribute 500 grams or more of cocaine, that is approximately 999 grams of cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 846(a)(1).

OVERT ACTS

In furtherance of the conspiracy and to effect the objectives of this conspiracy, the defendants and their co-conspirators performed overt acts in the District of Hawaii and elsewhere, including but not limited to:

1. On or about November 22, 2003, defendant LANI ANN BREWER opened an account with A-O-K Business Services in Honolulu, Hawaii.
2. On or about November 28, 2003, defendant LANI ANN BREWER and MICHAEL ALLEN BUSH entered the office of A-O-K Business Services, 350 Ward Avenue, Honolulu, Hawaii.
3. On or about November 28, 2003, defendants LANI ANN BREWER and MICHAEL ALLEN BUSH attempted to take possession of a parcel at A-O-K Business Services.
4. On or about November 28, 2003, defendant LANI ANN BREWER spoke on the telephone with an employee of A-O-K Business Services concerning the parcel.

5. On or about November 28, 2003, defendants LANI ANN BREWER and MICHAEL ALLEN BUSH went to the United States Post Office at Richards Street in Honolulu, Hawaii.

6. On or about November 28, 2003, defendant LANI ANN BREWER spoke on the telephone with an employee of A-O-K Business Services.

7. On or about November 28, 2003, defendant LANI ANN BREWER spoke on the telephone with an employee of A-O-K Business Services.

8. On or about November 28, 2003, defendant LANI ANN BREWER spoke on the telephone with an employee of A-O-K Business Services.

9. On or about December 17, 2003, defendant LANI ANN BREWER entered the office of A-O-K Business Services, 350 Ward Avenue, Honolulu, Hawaii, and spoke to an employee.

All in violation of Title 21, United States Code, Section 846.

COUNT 2

The Grand Jury further charges that:

On or about November 28, 2003 in the District of Hawaii, defendant MICHAEL ALLEN BUSH did knowingly and intentionally attempt to possess with intent to distribute 500 grams or more of cocaine, that is approximately 999 grams of cocaine, a Schedule II controlled substance. In violation of

Title 21, United States Code, Section 846, and Title 18, United States Code, Section 2.

DATE: JUN 02 2005, at Honolulu, Hawaii.

A TRUE BILL

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FOREPERSON, GRAND JURY

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United States v. Todd Takata, et al.
Cr. No.04-00134 SOM
SUPERSEDING INDICTMENT